

SICHENZIA ROSS FRIEDMAN FERENCE LLP

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Attorneys for Defendant Richard Wezner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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A-DEL CONSTRUCTION CORP., BARRY
J. BAKER, and HARRY G. JOHNSON,

Plaintiffs,

vs.

METROPOLITAN LIFE INSURANCE
COMPANY, METROPOLITAN SECURITIES,
INC., RICHARD WEZNER, PLR
MANAGEMENT CO., LLC, PENNSYLVANIA
BUSINESS GROUP, UNITED GROUP
PROGRAMS, MEDICAL BENEFIT
ADMINISTRATORS, MANULIFE FINANCIAL
CORPORATION, DONALD NEUHAUS,
AMERICAN FINANCIAL SERVICES, INC.,
and JOHN DOES(S) I-X,

Defendants.
-----X

Civ No. 1:07-09324-DAB

(ECF CASE)

**ANSWER TO CROSS-CLAIMS
ASSERTED BY METROPOLITAN
LIFE INSURANCE COMPANY,
METROPOLITAN SECURITIES,
INC., AND PENNSYLVANIA
BUSINESS GROUP**

Defendant Richard Wezner ("Defendant"), by and through his counsel, Sichenzia Ross Friedman Ference LLP, as and for his Answer to the Cross-Claims of Co-Defendants Metropolitan Life Insurance Company, Metropolitan Securities, Inc., and Pennsylvania Business Group (collectively, "Co-Defendants"), hereby states as follows:

CROSS-CLAIMS FOR INDEMNIFICATION

1. Defendant respectfully declines to respond to the allegations set forth in Co-Defendants' Cross-Claim for Indemnification on page 20 of their Answer on the grounds that it

may violate his constitutional rights pursuant to the Fifth Amendment to the United States Constitution and Article 1, Section 6 of the New York Constitution.

CROSS-CLAIMS FOR CONTRIBUTION

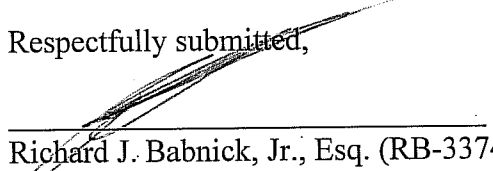
2. Defendant respectfully declines to respond to the allegations set forth in Co-Defendants' Cross-Claims for Contribution on page 21 of their Answer on the grounds that it may violate his constitutional rights pursuant to the Fifth Amendment to the United States Constitution and Article 1, Section 6 of the New York Constitution.

WHEREFORE, Defendant demands judgment:

1. Dismissing the Cross-Claims, with prejudice; and
2. Such other relief as this Court may deem just and proper.

Dated: August 21, 2008

Respectfully submitted,


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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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A-DEL CONSTRUCTION CORP., BARRY	:	Civ No. 1:07-09324-DAB
J. BAKER, and HARRY G. JOHNSON,	:	
	:	(ECF CASE)
Plaintiffs,	:	
	:	AFFIRMATION OF
vs.	:	<u>SERVICE</u>
	:	
METROPOLITAN LIFE INSURANCE	:	
COMPANY, METROPOLITAN SECURITIES,	:	
INC., RICHARD WEZNER, PLR	:	
MANAGEMENT CO., LLC, PENNSYLVANIA	:	
BUSINESS GROUP, UNITED GROUP	:	
PROGRAMS, MEDICAL BENEFIT	:	
ADMINISTRATORS, MANULIFE FINANCIAL	:	
CORPORATION, DONALD NEUHAUS,	:	
AMERICAN FINANCIAL SERVICES, INC.,	:	
and JOHN DOES(S) I-X,	:	
	:	
Defendants.	:	
-----X		

RICHARD J. BABNICK JR, an attorney duly admitted to the practice of law before the Courts of the State of New York, hereby affirms under the penalties of perjury that: I am not a party to the action, am over 18 years of age and reside in Clifton, New Jersey. On August 21, 2008, I caused to be served a copy of Defendant Richard Wezner's Answer to the Complaint and Answer to the Cross-Claims of Co-Defendants Metropolitan Life Insurance Company, Metropolitan Securities, Inc., and Pennsylvania Business Group, by mailing same in a sealed envelope, with postage prepaid thereon, in an official depository of the United States Postal Service

within the State of New York to the following Counsel that have appeared in the case:

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Dated: August 21, 2008



RICHARD J. BABNICK JR. (RB-3374)